

REMARKS

In the Office Action dated March 27, 2003, claims 32 and 33 were rejected under 35 U.S.C. § 101; claims 1, 2, 5-11, 13-23, and 26-34 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,078,582 (Curry); and claims 3, 4, 12-14, and 25-27 were rejected under § 103 over Curry.

The cancellation of claims 32 and 33 renders the rejection of those claims moot.

With respect to claim 1, Curry does not disclose an apparatus that includes a controller to receive stimulus control information from a digital interface and to *encapsulate the stimulus control information* into one or more packets. The Office Action equated the elements disclosed in Figs. 7 and 8 of Curry as disclosing the controller recited in claim 1. Note that the ITS shown in Fig. 7 of Curry receives a CCIS (common channel interoffice) message. Curry, 15:14-17. The ITS then sends in step 130 a signaling message in the form of a query message packetized in TCP/IP packets having the IP address of the destination ITS. Curry, 15:33-37. There is no indication in Curry that the CCIS query message received by the ITS is encapsulated by the ITS. Thus, there is no teaching by Curry of receiving control information and encapsulating *the* control information. Furthermore, even assuming that the ITS does encapsulate the received CCIS query message, the CCIS query message is *not* a stimulus control information as recited in claim 1. CCIS messages are exchanged between signaling transfer points (STPs) over data links in an SS7 network. Curry, 7:28-31. CCIS messaging does not constitute stimulus messages that are exchanged between terminal devices and a switching system, such as an off-hook indication, dialed digits, and so forth. Curry, 7:37-40, 57-62.

What Curry discloses is that terminal devices 64 (64a, 64b, and 64c in Fig. 6 of Curry) communicate according to their native stimulus language to a switching system in a respective central office (CO) or SSP 41 (*see* Fig 7 or 8 of Curry). In addition, the central office or SSP 41 communicates signaling over a standard or conventional CCIS network made up of links 70 in Fig. 6 of Curry. Curry, 12:2-10. Curry does not encapsulate the stimulus messages from the terminal devices. Each switching system 41

sends out CCIS signaling in response to the stimulus messages--there is no encapsulation performed of the stimulus messages.

Therefore, claim 1 is allowable over Curry.

With respect to independent claim 20, Curry does not disclose encapsulating stimulus control informant received from a first interface that communicates stimulus control information with a stimulus device. With respect to independent claim 28, Curry does not disclose encapsulating data according to a stimulus protocol into one or more packets for communication to a packet-based network.

With respect to independent claim 30, Curry does not disclose receiving at least one packet containing a stimulus message according to a first language, and decapsulating the at least one packet to extract the stimulus message according to the first language.

Independent claim 34 is allowable over Curry for reasons similar to those for independent claim 1.

In view of the foregoing, all claims are in condition for allowance, which action is respectfully requested. The Commissioner is authorized to charge any additional fees, including extension of time fees, and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0065US).

Respectfully submitted,

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Date



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